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April 21, 2025

Hon. Naomi Reice Buchwald
United States District Judge
United States District Court, Southern District of New York

Re: Hantel v. National Debt Relief, LLC, Case No. 1:25-cv-01907-NRB

Dear Judge Buchwald:

I write on behalf of Defendant National Debt Relief, LLC (“NDR”), pursuant to Fed. R. Civ. P. 6(b) and Section 1(D) of your Individual Practices, to request an eleven-day extension of NDR’s deadline to answer or otherwise respond to Plaintiff’s putative class action complaint (the “Complaint”), to and including May 12, 2025.

For context, Plaintiff filed his Complaint on March 7, 2025, and served a copy of the Summons and Complaint on NDR on March 11. Shortly thereafter, NDR filed an unopposed request for a 30-day extension of NDR’s response deadline, to and including May 1, 2025, which the Court granted on March 26, 2025.

This morning, undersigned counsel was notified that NDR’s internal legal counsel, who has been managing this litigation, underwent an emergency procedure requiring hospitalization. NDR’s internal legal counsel estimates that he will need at least one week to recover before being able to return to work. As a result, NDR respectfully requests a second extension of eleven days to answer or otherwise respond to Plaintiff’s Complaint. With this extension, NDR’s response deadline would be due by May 12, 2025.

Counsel for NDR has conferred with Plaintiff’s counsel regarding this request, and Plaintiff does not oppose.

No party will be prejudiced by the requested extension of NDR’s response deadline, which is brought in good faith based on unforeseen circumstances and not for the purpose of causing undue delay. The requested extension does not affect any other currently scheduled deadlines.

Per your Individual Practices, undersigned counsel will email a courtesy copy of this letter-motion to BuchwaldNYSDChambers@nysd.uscourts.gov.

Thank you in advance for your consideration of this request.

Respectfully submitted,

s/Gregory P. Szewczyk

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J. Matthew Thornton

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Attorneys for Defendant, National Debt Relief LLC